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Attorneys for Defendants
Immersion Corporation, Victor A. Viegas, Clent
Richardson, Stephen Ambler and Daniel Chavez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: IMMERSION CORPORATION
SECURITIES LITIGATION

This Document Relates to:
ALL ACTIONS

Case No. CV 09-4073 MMC

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING SCHEDULE FOR
FILING OF CONSOLIDATED
COMPLAINT AND RESPONSES
THERE TO**

(Civil L.R. 7-12)

Judge: The Honorable Maxine M. Chesney

Date Action Filed: September 2, 2009

1 **WHEREAS**, on December 21, 2009, this Court issued an order consolidating several
 2 related securities class action complaints as *In re Immersion Corporation Securities Litigation*,
 3 appointing John P. Loos as Lead Plaintiff and approving Lead Plaintiff's selection of Brower
 4 Piven, A Professional Corporation, as Lead Class Counsel, and directing Lead Plaintiff and
 5 defendants Immersion Corporation, Victor A. Viegas, Clent Richardson, Stephen Ambler and
 6 Daniel Chavez ("Defendants") (collectively, the "Parties") to meet and confer and, no later than
 7 January 8, 2010, submit a stipulated schedule for the filing of a consolidated complaint (the
 8 "Consolidated Complaint") and for the briefing of responses thereto;

9 **WHEREAS**, on July 1, 2009, Immersion Corporation ("Immersion" or the "Company")
 10 announced that the Audit Committee of its Board of Directors was conducting an investigation
 11 into certain previous revenue transactions in Immersion's Medical line of business;

12 **WHEREAS**, on August 10, 2009, Immersion (1) announced that its Audit Committee
 13 concluded that a restatement of the Company's previously issued consolidated financial
 14 statements as of and for the year ended December 31, 2008 and auditor's report thereon, and
 15 previously issued unaudited financial statements as of and for the periods ended March 31, 2009,
 16 December 31, 2008, September 30, 2008, June 30, 2008 and March 31, 2008, would be required
 17 ("Anticipated Restatement"); and (2) stated that it was diligently pursuing these matters and
 18 intended to file its restatement as soon as reasonably practicable after the conclusion of the Audit
 19 Committee's investigation and analysis;

20 **WHEREAS**, on December 1, 2009, Immersion announced that it was working diligently
 21 towards filing its restatement with the Securities and Exchange Commission ("SEC") as soon as
 22 practicable; and

23 **WHEREAS**, because the Parties anticipate that Immersion's Anticipated Restatement
 24 may relate to matters underlying and/or relevant to the allegations in this action, the Parties
 25 respectfully submit that judicial resources and those of the Parties may be conserved and that
 26 judicial efficiency may be achieved if the Consolidated Complaint were permitted to be filed after
 27 the Anticipated Restatement;
 28

1 **IT IS ACCORDINGLY STIPULATED**, pursuant to Civil L.R. 7-12, by and between
2 undersigned counsel for the Parties that:

- 3 (i) Lead Plaintiff shall file a Consolidated Complaint no later than 60 days after the
4 Anticipated Restatement is filed with the SEC, but, absent further Order by the
5 Court, in no event later than June 30, 2010. The Consolidated Complaint will
6 supersede all existing complaints filed in this action, and Defendants are not
7 required to respond to any of the complaints filed in this action prior to the
8 Consolidated Complaint;
- 9 (ii) The deadline for Defendants to move, answer or otherwise respond to the
10 Consolidated Complaint shall be 60 days after the Consolidated Complaint is
11 filed;
- 12 (iii) In the event Defendants move to dismiss the Consolidated Complaint, Lead
13 Plaintiff shall file his opposition(s) to Defendants' motion(s) no later than 60
14 days after such motion(s) are filed; and
- 15 (iv) In the event Defendants move to dismiss the Consolidated Complaint,
16 Defendants shall file any replies to Lead Plaintiff's opposition(s) to the
17 motion(s) to dismiss no later than 40 days after such opposition(s) are filed.
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1 Dated: January 7, 2010

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3 By: 

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7 Attorneys for Defendants
Immersion Corporation, Victor A. Viegas,
Clent Richardson, Stephen Ambler and Daniel
Chavez

9 Dated: January 7, 2010

BROWER PIVEN,
A Professional Corporation

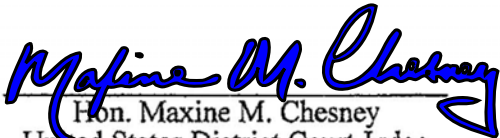
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15 Attorneys for Lead Plaintiff
and the Proposed Class

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 Dated: January 12, 2010


Hon. Maxine M. Chesney
United States District Court Judge

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